

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Richmond Division

ePLUS INC., )  
)  
)  
Plaintiff, )  
)  
v. ) Civil Action No. 3:09cv620 (REP)  
)  
LAWSON SOFTWARE, INC., )  
)  
)  
Defendant. )

**DEFENDANT LAWSON SOFTWARE, INC.'S MOTION IN LIMINE NO. 8 TO  
EXCLUDE ALLEGATIONS OF PURPORTED BREACH OF EMPLOYMENT  
AGREEMENTS BY THIRD-PARTY WITNESSES**

Defendant Lawson Software, Inc. (“Lawson”), by counsel, moves *in limine* to preclude Plaintiff ePlus, Inc. (“ePlus”) from presenting questioning, argument, or other purported evidence at trial relating to unsupported allegations of improper actions or misconduct of certain third-party fact witnesses pursuant to Fed. R. Evid. 402 and 403. Specifically, ePlus has suggested in depositions that two IBM witnesses, Charles Gounaris and Pamela Eng, breached their employment agreements with IBM or IBM corporate policy, but there is no evidence to support those assertions. The grounds for this Motion are more fully set forth in Lawson’s Memorandum in support of this Motion, which is filed herewith.

LAWSON SOFTWARE, INC.

By /s/  
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**CERTIFICATE OF SERVICE**

I certify that on this 18<sup>th</sup> day of June, 2010, a true copy of the foregoing will be filed electronically with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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